

October 30, 2002

Mr. Roger Lichtle
Dolco Packaging Corp.
2110 Patterson Street
Decatur, IN 46733-0469

Re: 001-16635
First Administrative Amendment to
FESOP 001-14652-00032

Dear Mr. Lichtle:

Dolco Packaging Corp. was issued a FESOP on September 11, 2002, for. A letter requesting an administrative amendment was received on October 1, 2002. Pursuant to 326 IAC 2-8-10(a)(1) and (6), an administrative amendment can be used for changes that "correct typographical errors", and to "revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". The requested changes meet these requirements, therefore, pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows (~~strike-out~~ to show additions and **bold** to show deletions):

(1) Section A.1 is amended as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary polystyrene extrusion plant.

Authorized individual:	Roger Lichtle
Source Address:	2110 Patterson Street, Decatur, Indiana 46733
Mailing Address:	2110 Patterson Street, Decatur, Indiana 46733
General Source Phone Number:	(219) 728-2161 (260) 728-2161
SIC Code:	3086
Source Location Status:	Adams
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD;

(2) Section A.2 is amended as follows:

(b) Eight (8) offset printers, constructed in 1972, with a combined **estimated** maximum ink usage of 28,000 pounds per year.

(3) Condition D.1.9 is amended as follows:

D.1.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the filter just prior to the thermal oxidizer, at least once per shift when the polystyrene food packaging production line is in operation. When for any one reading, the pressure drop across the ~~baghouses~~ **filter** is outside the normal range of 1.0 and 6.0 inches of water or a range established ~~established~~ during the latest stack test.

(4) Condition D.1.10 is amended as follows:

D.1.10 Baghouse Inspections

An inspection shall be performed ~~within the last month of~~ each calendar quarter of all bags controlling polystyrene food packaging production line **when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors.** All defective bags shall be replaced.

(5) Condition D.1.12(e) is amended as follows:

- (e) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10 **and the dates the vents are redirected.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,
Originally signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - Adams County
U.S. EPA, Region V
Adams County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

OFFICE OF AIR QUALITY

**Dolco Packaging
2110 Patterson Street
Decatur, Indiana 46733**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F001-14652-00032	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 11, 2002 Expiration Date: September 11, 2007

1 st Administrative Amendment No.: 001-16635	Pages Modified: 4, 23, 25, 26
Issued by:Originally signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:October 30, 2002

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary polystyrene extrusion plant.

Authorized individual:	Roger Lichtle
Source Address:	2110 Patterson Street, Decatur, Indiana 46733
Mailing Address:	2110 Patterson Street, Decatur, Indiana 46733
General Source Phone Number:	(260)728-2161
SIC Code:	3086
Source Location Status:	Adams
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) polystyrene food packaging production line consisting of the following:
 - (1) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions;
 - (2) One (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour, to control VOC emissions from thermoforming/molding and the curing room which were all constructed in 1972;
 - (3) Uncontrolled extrusion and final product storage operations, constructed in 1972, with maximum capacities included in a confidential file;
- (b) Eight (8) offset printers, constructed in 1972, with a combined estimated maximum ink usage of 28,000 pounds per year.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Paved and unpaved roads and parking lots with public access;
- (b) Enclosed systems for conveying plastic raw materials and plastic finished goods;
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) polystyrene food packaging production line consisting of the following:
 - (1) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions;
 - (2) One (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour, to control VOC emissions from thermoforming/molding and the curing room, which were all constructed in 1972;
 - (3) Uncontrolled extrusion and final product storage operations, constructed in 1972, with maximum capacities included in a confidential file;
- (b) Eight (8) offset printers, constructed in 1972, with a combined estimated maximum ink usage of 28,000 pounds per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limits [326 IAC 2-8]

Pursuant to F001-7300-00032, issued April 14, 2001, and 326 IAC 8-4 (FESOP), the following apply:

- (a) The input of polystyrene to the extruders shall be less than 16,783 tons per twelve (12) consecutive month period and the input of butane as a blowing agent shall be less than 479 tons per twelve (12) consecutive month period. The source shall operate the thermal oxidizer, with a destruction efficiency of ninety-six percent (96%), at all times that the thermoformers/molders, curing, and silos are in operation. This is equivalent to limiting the VOC emissions from the polystyrene food packaging production line to less than ninety-two (92) tons per year. This limit is structured such that when including VOC emissions from the remainder of the source, the source total VOC emissions remain below one hundred (100) tons per year. Therefore the requirements of 326 IAC 2-7 (Part 70 Permit), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 are not applicable.

In order to be in compliance with this limit, the thermal oxidizer shall operate at a minimum destruction efficiency of 96% and at the following capture efficiencies: 84% for curing, 100% for thermoforming, and 100% for the silos. The thermal oxidizer destruction and capture efficiencies together shall yield the following overall efficiencies: 80.61% for curing, 96% for thermoforming, and 96% for the silos.

- (b) The PM10 emissions from the polystyrene food packaging production line shall be limited to less than 7.75 pounds per hour or 33.95 tons per twelve (12) consecutive month period. Compliance with this limit will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Thermal Oxidizer

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be at or above the hourly average temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The fan frequency shall be observed at least once per week when the regenerative thermal oxidizer is in operation. When for any one reading, the fan frequency is outside the normal range of 41 to 43 hertz as established in the most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.8 Visible Emissions Notations

- (a) Once per shift visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the filter just prior to the thermal oxidizer, at least once per shift when the polystyrene food packaging production line is in operation. When for any one reading, the pressure drop across the filter is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.10 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling polystyrene food packaging production line when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.11 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the polystyrene input to the extruders and the input of butane as a blowing agent.
- (b) To document compliance with Condition D.1. 7, the Permittee shall record the continuous temperature records (on an hourly average basis) for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test. The Permittee shall also maintain weekly records of the fan frequency.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records of once per shift visible emission notations of the baghouse stack exhaust when exhausting to the atmosphere.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain once per shift records of the inlet and outlet differential static pressure during normal operation.
- (e) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10 and the dates the vents are redirected.